

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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Chapter 11

In re	:	
DELPHI CORPORATION, et al.	:	Case No. 05-44481 (RDD)
Debtor	:	Jointly Administered

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OBJECTION OF CREDITOR F&G MULTI-SLIDE INC. TO NOTICE OF CURE  
AMOUNT WITH RESPECT TO EXECUTORY CONTRACT OR UNEXPIRED  
LEASE TO BE ASSUMED AND ASSIGNED IN CONNECTION WITH SALE OF  
STEERING AND HALFSHAFT BUSINESS DATED JANUARY 23, 2008

Now comes Creditor F&G Multi-Slide Inc. (“F&G”) and hereby objects to the cure amount of \$0.00 listed in the Notice of Cure Amount With Respect to Executory Contract to be Assumed or Assumed and Assigned In Connection with Sale of Steering and Halfshaft Business dated January 23, 2008 for the following reasons:

1. Debtors’ Notice of Cure appears to relate to one executory contract listed on Exhibit 1 (Purchase Order Number SAG9014150) attached to the Notice, which proposes a cure amount of \$0.00 with respect to F&G. Debtors previously filed a Notice of Cure dated December 10, 2007, which referenced the same Purchase Order and also proposed \$0.00 as a cure amount. F&G objected to that Notice of Cure on January 9, 2008 (Doc. 11801), which Objection remains pending. The Notice of Cure dated January 23, 2008 duplicates the prior Notice of Cure, to which F&G has objected.

2. The actual total of amount owed to F&G was detailed and set forth in an Amended Proof of Claim filed on or about December 5, 2007 (Claim No. 16751), attached hereto and incorporated herein as Exhibit “A”, is \$250,422.69. This Amended Proof of Claim included the amount owed with respect to the Purchase Order at issue (\$9,913.77), as detailed in an

attachment to the Amended Proof of Claim. The total cure amount for all executory contracts between Debtors and F&G is \$250,422.69, of which \$9,913.77 is a part.<sup>1</sup>

3. Accordingly, F&G objects to the proposed cure amount of \$0.00 and respectfully requests that the Court order that the correct cure amount is \$250,422.69.

Respectfully submitted,

/s/Paul H. Spaeth

Paul H. Spaeth (Ohio Regist. No. 0010524)  
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CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a true and accurate copy of the foregoing Objection of Creditor F&G Multi-Slide Inc. To Notice of Cure Amount With Respect to Executory Contract or Unexpired Lease to be Assumed and Assigned in Connection with Sale of Steering and Halfshaft Business Dated January 23, 2008 was served electronically through the Court's electronic transmission facilities upon those parties receiving such service in this case and by ordinary United States mail service this 28th day of January, 2008 upon the following:

Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Bankruptcy Court  
for the Southern District of New York  
One Bowling Green, Room 610  
New York, New York 10004

Delphi Automotive Systems LLC  
Attn: Legal Staff

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<sup>1</sup> Debtors have acknowledged the validity of the Amended Proof of Claim, although modified from \$250,422.69 to \$247,705.24 and containing a reservation of rights, as set forth under "Treatment of Claim" in a Notice of Objection to Claim issued to F&G, dated January 18, 2008. Furthermore, F&G and Debtors have resolved an Objection that had been filed by F&G with respect to the estimation and provisional allowance of its claim solely for purposes of administration of discount rights offering, with Debtors having acknowledged that the discount rights offering participation amount is \$250,422.69, as indicated in Exhibit 1 to Doc. 12162, Debtor's Omnibus Reply in Support of Motion for Order approving estimation. As noted above, the \$250,422.69 figure includes the Purchase Order at issue.

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/s/Paul H. Spaeth  
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